

The Honorable Richard A. Jones

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

JANET CHLANTZOS-WILLIAMS  
Plaintiff,

vs.

SQUARE INC.

BEATRICE GROW

Defendants

Civil Action No. 3:21-CV-05069-RAJ

JOINDER IN DEFENDANT SQUARE INC.  
MOTION TO DISMISS FOR LACK OF  
SUBJECT MATTER JURISDICTION OR  
ALTERNATIVELY FOR FAILURE TO  
STATE A CLAIM

NOTE ON MOTION CALENDAR:  
November 12, 2021

COMES NOW, BEATRICE GROW and hereby joins in defendant Square Inc.'s Motion to Dismiss for Lack of Subject Matter Jurisdiction or Alternatively for Failure to State a Claim upon which release can be granted, and requests this Honorable Court dismiss this matter as to defendant Beatrice Grow.

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1 As answered by Defendant Grow, Plaintiff's claims do not raise a cognizable federal  
2 question and Plaintiff and Defendant Grow are both Washington residents, therefore, there is no  
3 diversity of citizenship and this court does not have subject matter jurisdiction.

4 Furthermore, Plaintiff's claims fail to state a claim upon which relief can be granted by  
5 this court pursuant to Federal Rule of Civil Procedure, 12(b)(6), therefore this matter should be  
6 dismissed as to all defendants.

7 Defendant Grow adopts the analysis, legal arguments and relief requested in Defendant  
8 Square Inc.'s Motion.

9 Dated: 26<sup>th</sup> day of October, 2021

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**CERTIFICATE OF ECF FILING AND SERVICE**

I certify that on October 26, 2021, I arranged for electronic filing of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties registered on ECF. I further arranged for the foregoing document to be mailed as follows and emailed to the plaintiff as indicated:

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